

## **Overview of Air Force Restoration Program – FY 00 and Beyond**

### **Lt Col Ray Knight, HQ USAF Restoration Chief**

Lt Col Knight provided a corporate overview of the Air Force (AF) environmental restoration program. He reviewed how the Air Force is structured, organizationally, and explained our relationship with the AF and Department of Defense (DoD) leadership in the environmental business. Lt Col Knight discussed the AF vision, goals, and commitments to the AF restoration program. He focused on how the principles and recommendations from the Federal Facilities Environmental Restoration Dialogue Committee (FFERDC) are used to shape the AF cleanup program. This topic led into a review of the AF budgeting process, the "Bottom-Up" aspect for requirement identification, and the importance of stakeholder involvement in the process. This process supports the AF stable funding request to DoD and Congress, allowing the AF to establish long-range commitments to stakeholders based on FFERDC principles of "Risk plus other Factors". However, stable funding does not necessarily mean level funding. Program funding is vulnerable to congressional cuts and priority realignments. Lt Col Knight specifically addressed his support of the DoD/State Memorandum of Agreement (DSMOA) and asked the states to help the AF demonstrate it "...is getting a return on this investment" in the DSMOA program. He concluded his presentation by identifying several challenges in the program and highlighted the upcoming AF partnering initiative.

## **Overview of Air Force Base Conversion Agency – FY 00 and Beyond**

### **John Smith, HQ AFBCA, Chief, Environmental Programs**

Mr. Smith discussed the differences between the environmental restoration program missions of the operational Air Force (AF) installations and those installations identified for conversion or closure. The primary mission of the Air Force Base Conversion Agency (AFBCA), which is to dispose of Base Realignment and Closure (BRAC) property, was emphasized. The environmental mission is to implement cleanup actions that allow for the "disposal" of property. The organizational structure and details of AFBCA were described, specifically that part involving environmental cleanup. Also discussed was the eventual regionalization of the program, some of which has already occurred.

Mr. Smith discussed the Defense Planning Guidance (DPG) for BRAC and AFBCA plans to meet the DPG.

Mr. Smith outlined the specific funding for Region 4 bases, as well as the funding process. A detail of current plans for site closeout was provided, including a toolbox for site closeout. The focus this year would be for the BRAC Cleanup Teams (BCTs) to develop a coordinated schedule to achieve site closeout that could be a guidance tool for the future.

Mr. Smith showed specific Land Use Control/Institutional Control Management Strategy guidance prepared for closure bases. Site Closeout Decision Support Tools, Quarterly Reviews and Regional Peer Reviews, and Site Closeout Assistance Visits were also described.

Mr. Smith discussed the ongoing struggle between meeting the goal of last remediation in place and completing lease documents to transfer property. With limited staff, both in the AF and regulator community, transfer and cleanup are often two competing goals that must be worked-out simultaneously. Even if there are no more BRAC rounds, Mr. Smith reminded everyone that there is a long-term role with the operating, maintaining, and monitoring of remediation systems. He also stated that the Air Force is committed to achieving site closeout.

**EPA Region 4 Program Review**  
**Jon Johnston, Federal Facilities Branch, EPA Region 4**

Mr. Johnston presented the organizational structure of the Environmental Protection Agency (EPA) Region 4. He indicated that the Federal Facilities Branch is located within the Waste Management Division. All federal facilities, regardless of law are the responsibility of the Federal Facilities Branch. There are two sections in this branch, the Department of Defense (DoD) Remedial Section, which includes Base Realignment and Closure (BRAC) facilities, and the Department of Energy (DoE) Remedial Section. Mr. Johnston indicated that there are nine Remedial Project Managers (RPMs) responsible for AF facilities in Region 4.

Mr. Johnston described the structured Tiered Partnering that exists in Region 4. He stated that Tier I is at the base level, Tier II at the state level, and Tier III is at the regional level. Tier III, which he co-chairs with Mr. George Carellas, the Region 4 DoD Regional Environmental Coordinator (REC) of the Army Environmental Center, meets bi-annually. Additionally, they have monthly teleconferences of the Steering Committee.

Mr. Johnston stated that the cleanup program also includes the Resource Conservation and Recovery Act (RCRA) corrective action, not just Superfund/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This led to open discussions from the audience as to how RCRA fits into the AF Installation Restoration Program (IRP) and CERCLA lead agent vs. RCRA permits. He challenged everyone to have an open mind and communicate.

Mr. Johnston included a briefing on the EPA Region 4 Policy on Land Use Controls (LUCs). He emphasized that LUCs are NOT the remedy of choice; that LUCs are the remedy of last resort, or a component of another remedy. He said that the goal is to be done with cleanup! Mr. Johnston gave examples of what he considers proper LUCs. He stated that if LUCs are an element of a remedy, the EPA requires various procedures to be taken to insure the LUCs will be maintained. Mr. Johnston said that a LUCs Assurance Plan (LUCAP), which is basically a Memorandum of Agreement (MOA) between the parties, must be in place. He went on to say that in addition, a LUCs Implementation Plan (LUCIP) must be completed and that the LUCIP includes individual plans for individual sites, including oversight responsibilities and a schedule for reporting. Mr. Johnston cautioned that feasibility studies need to be more detailed when including LUCs and they need to properly identify the true cost of the LUCs. He recommended that items such as field inspections, annual reports, notification of unauthorized land use changes, and advance notification of transfer must be considered.

Mr. Johnston concluded by stressing that there must be enhanced communication and cooperation between the agencies.

## **AF MAJCOM: A Regional Perspective**

### **Ed Newsome, Air Combat Command**

Mr. Newsome presented an overview of the Air Force (AF) program within the Environmental Protection Agency (EPA) Region 4. In Region 4, the AF has active cleanup programs at 37 AF installations, including three on the National Priorities List (NPL), located in eight states. These installation programs are managed by eight different AF Major Commands (MAJCOMs). Mr. Newsome provided a MAJCOM perspective of the goals and objectives of the cleanup program. The completion strategy to obtain these goals at the 839 sites and 241 Areas of Concern (AOC) identified at installations in Region IV were discussed. Included in the briefing were numerous data charts showing the current status and plan for completion of the program. The current site status was depicted in the AF Inventory Control Matrix. The site profile was then peeled back by relative risk ranking, a Department of Defense (DoD) prioritization tool. Based on current site schedules, Mr. Newsome identified those installations projected to be the last to achieve several program milestones, specifically Last Remedy in Place (LRIP) by installation. More importantly, an installation-by-installation breakdown of the funds programmed to achieve cleanup activities was provided.

The importance of stakeholder involvement was discussed. Success stories within the region (at Shaw AFB, Maxwell AFB, and MacDill AFB) were covered. The presentation concluded with challenges to progress: document review times; implementation of institutional controls; regulatory concurrence on site closure; changing guidance; regulations and policies; and post-site-closure monitoring.

## **State Perspective - Alabama**

### **C. H. Cox, Alabama Department of Environmental Management (ADEM)**

Mr. Cox provided an overview of the organizational structure for the Alabama Department of Environmental Management (ADEM).

The Installation Restoration Program (IRP) is the responsibility of the Governmental Facilities Section.

The initiatives in the State Superfund Law are being proposed for the next legislative session. The issues include voluntary cleanup and Brownfield provisions. A question was asked regarding the meaning of "voluntary cleanup" to which Mr. Cox responded "an agreement with the site to oversee cleanup before it goes on the National Priorities List (NPL)." In a situation such as this, the state charges for its time.

There are four Tier I partnering teams within the state, including one AF facility, Maxwell AFB. ADEM is a member of the Tier II team along with the Environmental Protection Agency (EPA), the Air Force (AF), and the Army. The accomplishments of the Maxwell AFB Tier I team including success stories associated with a reactive wall pilot study and soil vapor extraction were described. A major concern at Maxwell AFB is the existence of off-site groundwater contamination coming onto the base.

The briefing was concluded with the status of DoD/State Memorandum of Agreement (DSMOA) in the state. There are 22 total sites, handled by 5.5 full time equivalents (personnel).

A question was asked about the current backlog of documents to which Mr. Cox replied that no such backlog exists.

Mr. Cox was then asked if the state is satisfied with the quality of documents and he affirmed that the quality is very high.

**State Perspective - Florida**  
**Eric Nuzie, Florida Department of Environmental Protection**

Mr. Nuzie identified the various federal installations in Florida and described those that have established tiered partnering teams, including both Installation Restoration Program (IRP) and compliance. He described a pollution prevention initiative formalized by a charter between the state, the Environmental Protection Agency (EPA), and the Air Force (AF). Mr. Nuzie then cited some specific innovative technologies that were discussed that are in used at Patrick AFB/Cape Canaveral AS. He also described a standardized format for "success stories" that has been developed for the state. Mr. Nuzie identified an issue that Florida Department of Environmental Protection has concerning the Air Force funding of facilitators for the partnering teams, as well as DoD/State Memorandum of Agreement (DSMOA\_ funding issues. Lastly, Mr. Nuzie described the Land Use Control Guidance as a candidate for a "success story".

**State Perspective - Georgia**  
**Jim Ussery, Georgia Environmental Protection Division**

The organizational structure of the Georgia Department of Natural Resources and the Environmental Protection Division was presented.

The State of Georgia does not currently participate with the DoD/State Memorandum of Agreement (DSMOA).

Georgia currently has 6 full-time equivalents (personnel) working three AF Government Performance Results Act (GPRA) targeted Resource Conservation and Recovery Act (RCRA) facilities: Robins AFB, Moody AFB, and AF Plant (AFP) 6.

The work carried out in the four program groups include corrective action, facility compliance, generator compliance, and hazardous site response.

The Georgia Environmental Protection Division (GEPD) is expecting Robins AFB to sign a Memorandum of Agreement (MOA), allowing the transfer of regulatory authority from the Environmental Protection Agency (EPA) to the state.

GEPD currently has no backlog of AF reports awaiting review.

The briefing was concluded by discussing the state's GPRA goals and commitments.

**State Perspective - North Carolina**  
**Grover Nicholson, North Carolina Department of Environmental and Natural Resources**

Mr. Nicholson provided an overview of the North Carolina Department of Environmental and Natural Resources organization. He stated that he and four other engineers are responsible for federal facilities within the state. These facilities include two Marine, one Army, and two Air Force (AF) installations (Pope AFB and Seymour Johnson AFB).

He emphasized that the mission of the North Carolina Department of Environmental and Natural Resources organizations was to enforce all North Carolina laws and rules during cleanup.

Mr. Nicholson indicated, however, that they were also interested in pragmatic solutions. He agreed that institutional controls as part of another remedy are viable, but not the primary remedy of choice.

Mr. Nicholson identified five Tier I partnership teams in the state, each meeting eight to ten times per year. They have been very successful.

Mr. Nicholson highlighted a new North Carolina Department of Environmental and Natural Resources policy allowing the return of contaminated soil during construction efforts.



**State Perspective - South Carolina**  
**Ann Clark, South Carolina Department of Health and Environmental Control**

Ms. Clark presented a DoD/State Memorandum of Agreement (DSMOA) update for South Carolina, stating there were five project engineers, six project hydrologists, and one risk assessor responsible for the federal facilities. At this time, there were no backlog of documents. She presented an issue and a caution with DSMOA. Just because SC is given DSMOA money, it doesn't mean that they can perform immediately. She identified the reality that it takes time to wrap up. In addition, the state has an equity and a no RIF (reduction-in-force) policy. This does not allow hiring at higher levels for short duration of larger workloads. Rather, they attempt to achieve a stable, balanced workforce with promotions made from within. Ms. Clark presented the yearly DSMOA totals for documents reviewed, meetings and teleconferences, and site visits. Ms Clark discussed various issues including: the impact of the Government Performance and Results Act (GPRA) on the facilities within the state; the affect of Installation Restoration Program (IRP) vs. non-IRP designation of sites on DSMOA; the Shaw AFB Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 106 Order (EPA is looking at the potential for rescinding the order); property transfers at Myrtle Beach, where contamination was found on property that was already transferred; and the fixed price contracting test case at Charleston Navy Yard. Ms. Clark discussed partnering teams, and specifically stated that SC did not have the resources to expand partnering for all program areas (air, water, etc.). In her opinion, the bases do not have the resources either, instead, the state has an annual workshop.